

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

ILIO'ULAOKALANI COALITION,
a Hawai'i, nonprofit corporation;
NA IMI PONO, a Hawaii
unincorporated association; and
KIPUKA, a Hawai'i unincorporated
association,

Plaintiffs,

v.

DONALD H. RUMSFELD, Secretary of
United States Department of
Defense; and LES BROWNLEE, Acting
Secretary of the United States
Department of the Army,

Defendants.

) CIVIL NO.04-00502 DAE BMK
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) DECLARATION OF COLONEL
) ROBERT B. BROWN
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) Hearing:
) Date: November 20, 2006
) Time: 9:45
) Judge: Hon. David A. Ezra

I, Colonel (P) Robert B. Brown hereby declare that:

1. I am currently the Director, J-7 (Exercises & Training), United States Pacific Command. In my last assignment I served as the Commander, 1st Brigade, 25th Infantry Division, Stryker Brigade Combat Team from 2 July 2002 to 4 November 2005. In this capacity, I was involved in the conversion of the U.S. Army Brigade Combat Team from a Light or Mechanized configuration to a new concept called the Stryker Brigade Combat Team. My last year in command was spent in combat with the Stryker Brigade in Operation Iraqi Freedom from September 2004 to September 2005. In my opinion, delaying the transformation of the 2nd Brigade, 25th Infantry Division (Light) ("2nd Brigade") to a Stryker Brigade Combat Team ("SBCT 5") would have an immediate negative effect on the ability of the brigade to conduct combat operations and would jeopardize soldiers' lives in combat.

2. I have served on active duty in the Army for 25 years. Before my brigade command assignment, I served as a Joint Staff Officer, Commander of the 2nd Battalion 5th Cavalry Regiment (Mechanized), G-3 Plans on the Army Staff, Aide-de-Camp, Vice Chief of Staff of the Army, and in a variety of command and staff position from the platoon through battalion level.

I have completed a master's degree in education from the University of Virginia and a master's degree in national security strategy from the National War College.

3. During my nearly 3 and ½ years in command of a Stryker Brigade, I had the opportunity to be involved in many key events that assisted in transforming the Army to a more independent brigade structure. I was involved in the Initial Operational Test and Evaluation (IOT&E) of the Stryker concept, the medium weight vehicle comparison testing between the Stryker and the M113 vehicle, and the fielding and New Equipment Training (NET) of the Stryker Brigade Combat Team unique equipment. Throughout the training to deploy to combat one of the most important things we learned was that the SBCTs are configured to fight differently than previous brigades, with soldiers performing tasks at the brigade level that were previously conducted at much higher levels (division and above). This requires more extensive training and preparation in the initial stages of the fielding. We also concentrated on how training was different in an SBCT and determined that we needed to produce a more agile and adaptive soldier that can respond rapidly to changing situations. This agile and adaptive soldier requires extensive training in a variety of areas, such as leadership, adaptability, creative thinking, the use of digital information and advanced marksmanship techniques.

4. The SBCTs are unique units that bring new capabilities to the Army. My combat experience in Iraq led me to the conclusion that the SBCT is significantly more informed, responsive, mobile, lethal and survivable than other combat brigades. The SBCT uses its unique equipment and organization to rapidly assess complex situations, react faster and apply more precision to the fight. The SBCTs also have a very capable headquarters staff that brings lethal and non-lethal fires to the desired point on the battlefield effectively. These capabilities are essential to successfully conduct combat operations in today's environment to defeat the enemy and protect civilians and our own soldiers.

5. The Stryker vehicle is also a very effective and essential part of the Stryker Brigade Combat Team. Having spent a year in combat fighting from a Stryker vehicle, I can emphatically state that it is my vehicle of choice for combat operations in today's environment. The Stryker vehicle saved many of my soldier's lives due to its speed, protection, digital capability and design. As the brigade commander, I have personal knowledge that approximately 137 Rocket Propelled Grenades (RPGs) directly hit Stryker vehicles during our deployment. None of the RPGs penetrated a Stryker vehicle due to the Stryker's protection and speed. Additionally, the brigade had approximately 50 Suicide Vehicle Born Improvised Explosive Devices (SVBIED) directly hit Stryker vehicles. The protection afforded by the Stryker vehicle, despite the massive explosions and lethality from these suicide bombs, was essential to saving lives. The Stryker vehicle enabled the brigade's soldiers to perform their mission successfully, as it provided the mobility, protection and lethality required in combat situations. Regrettably, we did experience the loss of 33 soldiers assigned to the brigade in combat operations, but I estimate the losses would have been significantly higher if we had not been able to

fight configured as a Stryker Brigade Combat Team or use the Stryker vehicle during our training and deployment.

6. In my opinion, based on my Stryker experience, any delay in the training for the 2nd Brigade, 25th Infantry Division (SBCT5) will have a devastating effect on the preparedness of the soldiers to deploy and to conduct their primary mission. Any such delay could also potentially negatively impact many family members of the brigade and cause needless suffering and added separation. In my opinion, Stryker Brigade Combat Teams are an essential part of the Army's strategy to fight and win our Nation's wars and are critical for the fight in support of the Global War on Terrorism.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.



COLONEL (P) ROBERT B. BROWN

7 NOV 2006

Date